



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MA 02109-3912

MAR 29 2011

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER  
REQUIRES PROMPT RESPONSE**

Mark J. Bodzioch, President  
Clean Rentals, Inc.  
355 Church Street  
New Bedford, MA 02746

Re: Clean Air Act Reporting Requirement

Dear Mr. Bodzioch:

The United States Environmental Protection Agency ("EPA") is evaluating whether Clean Rentals, Inc. ("Clean Rentals") is in compliance with the Clean Air Act ("the Act") and state and federal regulations promulgated under the Act. These requirements include but are not limited to the federally enforceable sections of the Massachusetts State Implementation Plan ("SIP") regulations at 310 CMR 7.00 et. seq, as well as a Limited Plan Approval E-V7 for Fuel Utilization issued by the Massachusetts Department of Environmental Protection on 10/2/98.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act. This letter requires Clean Rentals to provide specific information about operations at its New England facilities.

Within 60 days of receiving this letter, Clean Rentals is required to provide the following information about the New Bedford facility located at 355 Church Street in New Bedford, MA, as well as any and all transfer stations for laundry located in New England and any businesses purchased by Clean Rentals. The term "towels" means shop, furniture or print towels of the types used by commercial or industrial businesses to remove oils, paints and/or solvents from machinery and equipment. Where appropriate submit responses in an electronic spreadsheet format that is compatible with Microsoft Excel.

## Reporting Requirement

Within sixty (60) days of receipt of this letter, Clean Rentals is required to provide a list of all facilities in any of the six New England states where Clean Rentals currently operates or has operated in the past five years. Include a brief description of the activities that take place at each facility.

- 1) Describe each facility's ownership and business structure:
  - a) Indicate the date and state of incorporation;
  - b) List any partners or corporate officers;
  - c) List any parent and subsidiary corporations;
  - d) Provide the number of employees at the facility;
  - e) Provide the net worth of the entity that owns the facility; and
  - f) Provide the date that Clean Rentals began operations at each facility.
- 2) Describe the logistics associated with receiving and transporting soiled towels at the Clean Rentals New Bedford facility. Specifically:
  - a) Indicate whether soiled towels are picked up at individual customer locations exclusively, or whether Clean Rentals uses any drop off centers or other types of collection facilities;
  - b) If drop-off centers or other types of collection facilities are used, specify the location(s) of these facilities by street address, city/town and state;
  - c) Indicate whether pick-ups are scheduled for particular days of the week or take place on an "as needed basis;"
  - d) State how long trucks are typically in transit with each customer's towels;
  - e) Describe how soiled towels are stored within trucks (e.g., whether solely within individual customer bags, or in bags contained within bins, vats, bays or other types of containment); and
  - f) Describe the types of bags or containers provided to customers for storage and/or transportation of their soiled towels. In the description, include the capacity of the bags or containers, the material the bags or containers are made of, and explain whether the bags or containers are designed to separate any liquids contained within the soiled towels.
- 3) For each Clean Rentals facility in New England that launders or has laundered towels, indicate the dates when each facility began, and if applicable, ceased, laundering towels.
- 4) Provide copies of analytical results from any and all emissions testing or internal air monitoring for VOCs or HAPs conducted at Clean Rentals' New Bedford location, including testing results relevant to the development of any facility-specific emission factors. Because a copy of the results from air monitoring conducted on December 3,



2009 by Coler and Colantonio was provided to EPA during the November 18, 2010 inspection, Clean Rentals does not need to resubmit this information to EPA.

- 5) For the New Bedford facility, provide the following information for the time period between January 1, 2006 and the present:
  - a) The actual quantity (in pounds) of soiled towels received and processed per month and per year. For the purposes of responding to this Information Request the term “processed” shall be defined as “laundered and dried”. If Clean Rentals distinguishes between categories of towels provided to customers in any way (e.g., print towels, furniture towels, garage towels, auto-body towels) please provide the summary of towels processed using such categorization, including the color(s) of these towels;
  - b) Any and all data describing the VOC and/or HAP content of the soiled towels, including information about the specific solvents or oils contained on the towels;
  - c) Any and all data or calculations of a dirty to clean weight ratio (e.g. 200 pounds of soiled print towels will result in 100 pounds of clean print towels);
  - d) Monthly and annual VOC and/or HAP emissions from towel laundering operations (explain the calculation and any assumptions);
  - e) Records of VOC and/or hydrocarbon and/or HAP content at any point in the wastewater stream;
  - f) Monthly and annual VOC and/or HAP emissions from wastewater pretreatment operations (explain the calculation and any assumptions);
  - g) Any and all instructions provided to customers regarding how they should store their soiled towels and as well as any restrictions on the solvent content of these towels; and
  - h) Specifications of the load cycle times associated with soiled towels, including the typical weight of a load of towels and wash and drying time for each category of soiled towels processed.
  - i) Identify factors that limit the facility’s capability to process soiled towels, such as equipment capacities, load cycle times, and wastewater discharge limits. Specify how each such limit impacts the quantity of soiled towels that can be processed per day.
- 6) For the New Bedford facility, provide the following information about the washers and dryers used for laundering towels:
  - a) Make, model, capacity and any other operational specifications of each washer and dryer;
  - b) Date of purchase of each washer and dryer;
  - c) Date of installation of each washer and dryer;
  - d) Data that each washer or dryer was put into operation; and
  - e) Date that each washer or dryer was taken out of service, if applicable.
- 7) Provide a description of the wastewater treatment process at the New Bedford facility. Provide a diagram of the wastewater treatment operations, and include:
  - a) All tanks used for wastewater storage or treatment (specifying the location of the tank, capacity of the tank in gallons or liters, and the type of treatment occurring in the tank – such as pH adjustment, coagulation/flocculation, etc);

- b) Catch basins and trenches used to collect wastewater;
  - c) Equipment used to extract solvents or other liquids from incoming materials; and
  - d) Specifications pertaining to the ozone injection system in use at the New Bedford facility, including:
    - i) Date of installation;
    - ii) Log or other documentation indicating when this unit was or was not in service during the calendar year 2010; and
    - iii) Results of any wastewater sampling conducted pre and post ozone injection from 2006 to present.
- 8) Provide a report that contains the 12 month rolling annual, monthly and daily effluent flow data for Clean Rentals' wastewater treatment operations from January 1, 2006 to present. If possible, provide this information in a spreadsheet format that is compatible with Microsoft Excel.
  - 9) Provide copies of results from any analytical testing on sludge from the New Bedford facility's wastewater treatment system from 2006 to present, as well as copies of all paperwork (manifests, bills of lading, etc.) documenting the off-site shipment of sludges generated from the wastewater treatment system from 2006 to present.
  - 10) For the New Bedford facility, provide annual VOC and HAP emissions since 2006 from:
    - a) All cleaning agents used on-site that contain VOCs and/or HAPs;
    - b) All operational solvents and oils used on-site that contain VOCs and/or HAPs; and
    - c) All fuel burning equipment.
 Briefly describe how you performed the calculations.
  - 11) During EPA's November 18, 2010 inspection of the New Bedford facility, Clean Rentals indicated that certain print towels were sent to Brent Industries of Ohio to be dry cleaned. Please provide:
    - a) A copy of any written Clean Rentals policy(ies) with respect to acceptance of towels from printers or furniture manufacturers ;
    - b) Copies of contracts between Clean Rentals and Brent Industries;
    - c) Copies of contracts between Clean Rentals and any other print towel or furniture towel laundering or dry cleaning facilities in the United States or elsewhere; and
    - d) Copies of invoices and other documentation showing the number of shipments of print towels as well as furniture towels sent from Clean Rentals to Brent Industries of Ohio for the period from January 1, 2006 to present.
  - 12) For each year from 2006 through 2010, provide an estimate of the average length of time in days that soiled towels were stored on-site or in trucks locations and at affiliated depot locations. Include copies of supporting information.
  - 13) Provide a list of all Clean Rentals customers that have had towels laundered at the New Bedford facility for the period January 1, 2010 to the present. Include the client's name, city or town, and state, and the types of towels generated by this customer. If possible,



provide this information in a spreadsheet format that is compatible with Microsoft Excel. Specify:

- a) The annual weight of soiled towels generated by each customer;
- b) The frequency of receipt of towels from each customer; and
- c) The Standard Industrial Code (SIC code) or North American Industry Classification Code (NAICS code) applicable to each customer.

- 14) Provide copies of all correspondence Clean Rentals (or any of its predecessors) has had with state and federal environmental agencies regarding air emissions at New England facilities, including copies of:
- a) All permits issued;
  - b) All permit applications; and
  - c) Any requests for permit modifications.

Mail the submissions required by this letter to:

Susan Studlien, Director  
Office of Environmental Stewardship  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100, OES04-2  
Boston, MA 02109-3912  
Attn: Joan Jouzaitis, Air Technical Unit (Mail Code OES04-2)

Be aware that if Clean Rentals does not provide the requested information, EPA may order Clean Rentals to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law also establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act.

Clean Rentals may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. §2.203(b). Information subject to such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. Note that certain categories of information, such as emissions data, are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Clean Rentals. Please be aware that states may have different rules and regulations governing the protection of confidential business information.

If you have any questions regarding this information request, please contact Joan Jouzaitis, Environmental Engineer, at (617) 918-1846 or, have your attorney call Thomas T. Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,

A handwritten signature in cursive script that reads "Susan Studlien".

Susan Studlien, Director  
Office of Environmental Stewardship

Enclosures

cc: Gregg Hunt, MassDEP, Southeast Regional Office